

Gary R. Stickell (AZ Bar #007512)
301 E. Bethany Home Road, Suite B100
Phoenix, Arizona 85012
(602) 266-2622
Email: gstickell@garystickell.net
Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In re:

SUSAN SIMPSON,

Debtor.

Chapter 13 Proceeding

No. 2:20-bk-02088 EPB

**NEW HORIZONS ROTH 401K PROFIT
SHARING PLAN, BRAD GILBERSTON
AS TRUSTEE,**

Movant,

v.

**SUSAN SIMPSON AND DARWIN
SIMPSON, a married couple,**

Respondents.

OBJECTION TO NOTICE OF DEFAULT

**RE: 5320 E. THUNDER HAWK RD.
CAVE CREEK ARIZONA**

Debtor objects to the Notice of Default filed by Movant New Horizons Roth 401k Profit Sharing Plan, Brad Gilbertson as Trustee for the reason that Debtor is in a forbearance with Chase Bank. Movant and its Attorney are well aware of this. The Notice of Default is filed in bad faith and both Movant and its Movant's attorney should be sanctioned in the amount of Debtor's Attorney Fees in bringing this Objection.

1 DATED: June 14, 2021

2 GARY R. STICKELL,
3 ATTORNEY AT LAW

4 By: G.R.S. #7512
5 Attorney for Debtor

6 **Original** Electronically
7 filed June 14, 2021

8 Copy served June 14, 2021
9 by ECF

10 Edward J. Maney
11 Chapter 13 Trustee
12 101 N. First Ave., Suite 1775
13 Phoenix, Arizona 85003
14 Chapter 13 Trustee

15 Dean W. O'Connor PLLC
16 2942 N 24th Street Suite 114-336
17 Phoenix, AZ 85016
18 Attorney for New Horizon

19 by: G.R.S. #7512
20
21
22
23
24
25
26
27
28